REMARKS

Claims 1-18 and 24-29 are presented for further examination. Claims 1, 18, 24, and 27 have been amended. Claims 19-23 were canceled as non-elected.

In the final Office Action mailed February 2, 2010, the Examiner rejected claims 1-29 [*sic*] under 35 U.S.C. § 103(a) as obvious over previously-cited Bowman et al. in view of previously-cited Johnson.

Applicants respectfully request reconsideration and further examination of the claims.

Claim Rejections

Applicants previously amended the independent claims to recite the secret key and the fixed value as being "pre-stored" on the integrated circuit, which would distinguish over the Bowman et al. reference. In the final Office Action, the Examiner disagreed with the argument that Bowman et al. do not store a "key" in advance of decrypting the signal. Thus, the Examiner has maintained the rejection of the claims over the previously-cited references.

On page 2 of the remarks accompanying the rejection, the Examiner asserts that Bowman et al. disclose at column 7, lines 33-55, and again at column 8, lines 20-30, the reception of an encrypted key and the subsequent generation of a decryption key and storing of the same prior to reception of encrypted information. It is the Examiner's position, as understood by applicants, that this meets the claimed "pre-storing" of the decryption key.

While the Examiner is correct in that Bowman et al. describe an embodiment in which a key generation (KG) algorithm is performed to decrypt a received decryption key (D-Key) that is stored in advance of reception of the encrypted signal, the KG algorithm must be performed by a generation circuit in response to reception of a subscription key (S-Key) value.

In contrast, the present disclosed circuit has both the fixed value and the secret key stored on the Hardware Feature Manager circuit 60 in advance of reception of any signal (*i.e.*, the encrypted broadcast signal with encrypted control words and enablement unlocking signal) thus avoiding the necessity of having the KG algorithm circuit and the necessity of receiving an S-Key in order to generate the fixed value and the secret key. The preamble to

claim 1 was amended to recite "without requiring receipt of one or more transmitted keys." Because this limitation is in the preamble, the Examiner is apparently not considering it as a limitation in the claim itself.

In a telephone conference with the Examiner on March 29, 2010, the undersigned proposed an amendment to the claims in which the phrase "and without requiring receipt of one or more transmitted keys" would be inserted into claim 1 with respect to the "first decryption circuit." The Examiner advised the undersigned that such an amendment would require a new search and hence the filing of a Request for Continued Examination application.

Thus, applicants are submitting this RCE with the amendments to the claims as outlined above. More particularly, claim 1 now recites the first decryption circuit arranged to receive the encrypted enable signal and to decrypt the encrypted enable signal in accordance with a key stored on the integrated circuit to provide a plain text message and without requiring receipt of one or more transmitted keys.

Because Bowman et al. require advance decryption of the D-Key which is stored prior to the reception of the encrypted signal, and which requires the reception of a subscription key (S-Key value) in order to do so, the circuit of Bowman et al. is inherently less secure than the claimed circuit. Adding the teachings of Johnson does not overcome this deficiency. Thus, applicants respectfully submit that claim 1 and accompanying dependent claims 2-17 are allowable over the combination of Bowman et al. and Johnson.

Independent claim 18 is directed to a television decoder that includes, *inter alia*, a first decryption circuit arranged to receive the encrypted enable signal and to decrypt the encrypted enable signal in accordance with a key stored on the integrated circuit prior to reception of the encrypted broadcast signals and to provide a plain text message without requiring receipt of one or more transmitted keys. Similarly, claim 24 is directed to a circuit for receiving encrypted broadcast signals and to produce audio-video signals therefrom in which an encrypted enable signal is received and decrypted in accordance with a pre-stored key that is stored in the first decryption circuit and to output a plain text message without requiring receipt of one or more transmitted keys.

Thus, all of the claimed embodiments are able to receive encrypted signals and to decrypt the same without having to receive keys. In other words, all of the keys have been stored on the circuit even in advance of enablement of the circuit to process received signals other than the enabling signal. Nowhere do Bowman et al. or Johnson taken alone or in any combination thereof teach or suggest this combination as recited in claims 18 and 24.

Independent claim 27 is a method claim that includes a step of decrypting an encrypted enable signal in accordance with a pre-stored key without requiring receipt of one or more transmitted keys and to output a plain text message. Claim 27 further recites comparing the plain text message with a pre-stored value and selectively outputting an enabling control signal that is used by a decryption circuit to decrypt the encrypted broadcast signals and produce the audio-video signals. Here again, the key values are stored in the circuit prior to enablement and decryption of encrypted broadcast signals. Nowhere do Bowman et al. or Johnson, taken alone or in any combination thereof, teach or suggest this feature as recited in the method of claim 27 and corresponding dependent claims 28 and 29.

In view of the foregoing, applicants respectfully submit that all of the claims remaining in this application are in condition for allowance. In the event the Examiner disagrees or finds minor informalities that can be resolved by telephone conference, the Examiner is urged to contact the undersigned by telephone at (206) 622-4900 in order to expeditiously resolve prosecution of this application. Consequently, early and favorable action allowing these claims and passing this case to issuance is respectfully solicited.

Respectfully submitted,

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